

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RON LANDIS

Plaintiff,

V.

CITY OF ROWLETT

Defendant.

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CIVIL ACTION NO.: 3:11CV269-K

PLAINTIFF'S FIRST AMENDED DESIGNATION OF EXPERT WITNESSES

COMES NOW RON LANDIS, Plaintiff in the above styled and numbered cause of action and files this his First Amended Designation of Expert Witnesses pursuant to Federal Rules of Civil Procedure Rule 26(a) (2) and pursuant to an agreement between the parties to remove two experts from the list. The Court's Scheduling Order entered on March 10, 2011, required the Plaintiff to designate experts by a date certain and this Amended Designation is not intended to alter or fail to comply with the Court's Order, but rather is to reduce the number of experts that are non-retained experts which Plaintiff intends to call to testify.

I.

**WITNESSES WHICH ARE NOT RETAINED BUT WHO ARE EXPECTED TO PRESENT
TESTIMONY WHICH COULD BE CHARACTERIZED AS BEING PRODUCED PURSUANT
TO FEDERAL RULES OF EVIDENCE 702, 703, OR 705.**

Each of the following medical personnel are or were treating physicians for Plaintiff and each may be called to testify as to the treatment provided to Plaintiff, to the medications prescribed for Plaintiff, to the individual doctor's assessment and mental impressions of the

injury or injuries for which they treated Plaintiff or for which they made referrals for treatment.

Additionally, each of these physicians may be called upon to present their professional opinion of the nature of Plaintiff's injuries and their professional opinion as to the degree to which such injury or injuries impaired Plaintiff's abilities to engage in normal life activities as well as Plaintiff's ability to perform the work required by his job with the Rowlett Fire Department. Each of these doctors have already been identified in discovery and medical records from each have already been provided to Defendant's counsel or a release for Defendant's Counsel to obtain such records has been provided which further identifies the treatment provided, medications prescribed, and notations as to restrictions or limitations imposed by Plaintiff's medical condition:

Dr. Edward Shin / pain management
5804 Communications Pkwy # 100, Plano, TX 75093
(972) 781-0300

Dr. Bosita / back surgery
Texas Back Institute
6300 W Parker Rd Ste 102, Plano, TX 75093
(972) 608-5011

Dr. Bernstein / pain management
Texas Back Institute
6300 W Parker Rd Ste 102, Plano, TX 75093
(972) 608-5011

Dr. Rashbaum / pain management
6020 W Parker Rd, Plano, TX 75093
(972) 608-5000

Dr. Erin Silav/ Pain Management
Central Pain Management
1207 Arsta Dr. Suite 103
Rockwall, Texas 75032
Phone 214-771-3535

Dr. Richard Bellinger (Primary Care Doctor)
6435 S Fm 549, Rockwall, TX 75032
(972) 771-9155

Additionally, Attorney John Weddle, Attorney of Record for Plaintiff, is expected to testify as to the Reasonable and Necessary Attorney Fees incurred in this case by Plaintiff to prosecute his claim. Such testimony will, of necessity change continuously until date of trial due to the continued time and resources being used to pursue this litigation so this response will be supplemented thirty days prior to trial and any additional costs or fees incurred during the time period after that will be provided prior to jury selection with an estimate for the time needed for trial.

II.
RETAINED EXPERT WITNESSES

Plaintiff has not retained expert witnesses in this case.

WHEREFORE PREMISES CONSIDERED Plaintiff Requests that the above listed Expert Witnesses be designated as the individuals which may be called to testify who may be asked questions which would be classified as being within the scope of Federal Rules of Evidence Rules 702, 703, or 705.

Respectfully submitted,

By: _____
John Weddle
Texas Bar No. 21060600
3131 Turtle Creek Blvd.
Suite 901
Dallas, TX 75219
Tel. (214) 521-9100
Fax. (214) 521-9130
Attorney for Plaintiff
Ron Landis

CERTIFICATE OF SERVICE

I certify that on November 23, 2011, a true and correct copy of Plaintiff's Response to Interrogatories was served by the Court's electronic service providing notice of documents electronically filed with the court to counsel for Defendant, **Marigny Lanier, 3710 Rawlins Street, Suite 1550, Dallas, Texas 75219**

John Weddle